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December 13, 2005

VIA UPS OVERNIGHT

The Honorable Ron Jones
Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

Re: Nashville Gas Company, a Division of Piedmont Natural Gas Company, Inc. –
Docket No. 05-00165

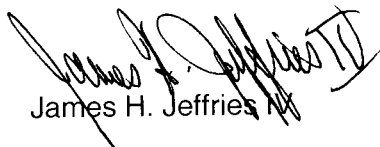
Dear Chairman Jones:

Pursuant to the procedural schedule established in this proceeding and Tenn. Comp. R. and Reg. 1220-1-1-2-.11, Nashville Gas Company respectfully submits a copy of the Responses of Nashville Gas Company to the Consumer Advocate and Protection Division's First Set of Discovery Requests. All Confidential responses and documents have been submitted under seal and marked Confidential.

Please accept these Responses for filing and return one filed-stamped copy of this letter to me in the enclosed self-addressed and stamped envelope.

Thank you for your assistance with this matter. If you have any questions regarding this filing, you may reach me at the number shown above.

Sincerely,



James H. Jeffries IV

JHJ/bao

Enclosure

BEFORE THE TENNESSEE REGULATORY AUTHORITY

NASHVILLE, TENNESSEE

December 13, 2005

IN RE:

REVIEW OF NASHVILLE GAS COMPANY'S) DOCKET NO. 05-00165
IPA RELATING TO ASSET MANAGEMENT FEES)

**RESPONSES OF NASHVILLE GAS COMPANY,
A DIVISION OF PIEDMONT NATURAL GAS COMPANY, INC.,
TO THE CONSUMER ADVOCATE AND PROTECTION DIVISION'S
FIRST SET OF DISCOVERY REQUESTS**

Nashville Gas Company, a Division of Piedmont Natural Gas Company, Inc. ("Nashville Gas" or "Company"), pursuant to the Tennessee Regulatory Authority's November 28, 2005, *Order Establishing Procedural Schedule* and Tenn. Comp. R. and Reg. 1220-1-1-2-.11, respectfully submits the following responses to the Consumer Advocate and Protection Division's First Set of Discovery Requests.

General Objections

Nashville Gas objects to the Consumer Advocate and Protection Division's First Set of Discovery Requests to Nashville Gas Company to the extent that they seek the disclosure of information or documents:

1. Beyond the scope of legitimate discovery in this proceeding;
2. Subject to the attorney-client privilege;
3. Constituting attorney work product; or
4. Prepared in anticipation of litigation.

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DISCOVERY REQUESTS

DISCOVERY REQUEST NO. 1:

Please identify each person whom you expect to call as an expert witness at any hearing in this docket, and for each such expert witness:

- (a) Identify the field in which the witness is to be offered as an expert;
- (b) Provide complete background information, including the expert's current employer as well as his or her educational, professional and employment history, and qualifications within the field in which the witness is expected to testify, and identify all publications written or presentations presented in whole or in part by the witness;
- (c) Provide the grounds (including without limitation any factual bases) for the opinions to which the witness is expected to testify, and provide a summary of the grounds for each such opinion;
- (d) Identify any matter in which the expert has testified (through deposition or otherwise) by specifying the name, docket number and forum of each case, the dates of the prior testimony and the subject of the prior testimony, and identify the transcripts of any such testimony;
- (e) Identify the terms of the retention or engagement of each expert including but not limited to the terms of any retention or engagement letters or agreements relating to his/her engagement, testimony, and opinions as well as the compensation to be paid for the testimony and opinions; and
- (f) Identify any exhibits to be used as a summary of or support for the testimony or opinions provided by the expert.

RESPONSE: Nashville Gas objects to this data request to the extent it seeks the disclosure of information or documents that are beyond the scope of discovery permitted of expert witnesses

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under Tennessee law. Without waiving this objection, Nashville Gas states that it has not yet determined whether to call any independent expert witnesses to testify at the hearing of this matter. In the event Nashville Gas makes such a determination, it will supplement this response.

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DISCOVERY REQUEST NO. 2:

Please identify the name and location of all persons having knowledge of discoverable matters in this case.

RESPONSE: Nashville Gas objects to this request on the grounds that it is overbroad, unduly burdensome and seeks information beyond the knowledge of Nashville Gas Company. Without waiving this objection, Nashville Gas Company states the following persons may have information responsive to this request:

1. Keith P. Maust, Director – Gas Supply and Wholesale Marketing
2. Thomas E. Skains, President and CEO
3. James N. Jessee, Supervisor – Gas Supply and Wholesale Marketing
4. Frank H. Yoho, Senior Vice-President – Commercial Operations
5. Scott Searcy, Senior Gas Supply Representative
6. Sarah Stabley, Gas Supply Representative
7. Ware F. Scheifer, Former President and CEO
8. Members of Andersen Consulting involved in recommending approval of the initial plan
9. Members of the Tennessee Public Service Commission and Tennessee Regulatory Authority who approved the initial and final incentive plans
10. Members of the Tennessee Regulatory Authority and Consumer Advocate and Protection Division Staff who participated in prior proceedings related to the Company's incentive plan

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DISCOVERY REQUEST NO. 3:

Please produce copies of all documents referred to or relied upon in responding to the Attorney General's discovery requests.

RESPONSE: Please see documents attached hereto.

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DISCOVERY REQUEST NO. 4:

Please produce copies of all documents, summaries, charts, trade articles, journals, treatises, publications, workpapers, file notes, chart notes, tests, test results, interview notes, and consultation notes provided to, reviewed by, utilized by, relied upon, created by, or produced by any proposed expert witness in evaluating, reaching conclusions or formulating an opinion in this matter.

RESPONSE: Nashville Gas objects to this request to the extent it seeks discovery regarding an expert witness that is greater than that permitted by Tennessee law. Without waiving this objection, Nashville Gas states that it has not, as yet, formulated an intent to retain any experts in connection with this proceeding. In the event it does so, it will supplement its response to this discovery request consistent with its objections stated above.

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DISCOVERY REQUEST NO. 5:

Please produce copies of the annual report of shared gas cost savings for the periods July 1, 2001, through June 30, 2002; July 1, 2002, through June 30, 2003; July 1, 2003, through June 30, 2004; and July 1, 2004, through June 30, 2005.

RESPONSE: Please see attached documents.

LAW OFFICES
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August 28, 2002

Ms. Sara Kyle, Chairman
 Tennessee Regulatory Authority
 460 James Robertson Parkway
 Nashville, TN 37243-0505

Re: Nashville Gas Company, Docket No. 99-00207

Dear Chairman Kyle:

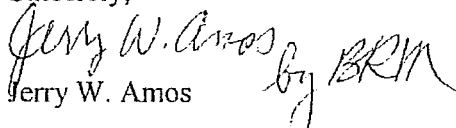
In accordance with the reporting provisions of Service Schedule No. 14, Performance Incentive Plan, as approved in the above captioned docket, Nashville Gas Company ("Nashville") submits the accompanying report of shared gas cost savings for the plan year ended June 30, 2002.

As the summary indicates, the accumulated total gains and savings under the plan for the plan year total \$2,592,578. Of this amount, \$1,207,494 has accrued to the Company's ratepayers. The remaining \$1,385,084 will be credited to the Company's Incentive Plan Account (IPA).

Detailed calculations supporting the amounts shown on the summary for the period July 2001 through April 2002 have previously been provided to the Tennessee Regulatory Authority Staff and the Consumer Advocate and Protection Division. Supporting calculations for May 2002 and June 2002 are provided in this filing subject to the execution of non-disclosure agreements. As permitted by the provisions of the approved tariff, the Company will file a rate adjustment on or about October 1, 2002, to amortize the collection of the June 30, 2002 IPA balance over the 12-month period beginning November 1, 2002 and ending October 31, 2003.

I am enclosing one additional copy of the summary that I would appreciate your stamping "filed" and returning to me in the enclosed envelope.

Sincerely,


 Jerry W. Amos

Enclosures

c: Russell Perkins, Deputy Attorney General
 Dan McCormac, Tennessee Regulatory Authority

Report on Nashville Incentive Plan July 2001 - June 2002

Month	Year	Gas Procurement Incentive Mechanism	Nashville GPI Sharing	Ratepayer GPI Sharing	Capacity Management Incentive Mechanism	Nashville CMI Sharing	Ratepayer CMI Sharing	Total Gain/(Loss)	Total Nashville Gain/(Loss)	Total Ratepayer Gain/(Loss)
July	2001	\$ (11,568)	\$ -	\$ (11,568)	\$ -	\$ -	\$ -	\$ (11,568)	\$ -	\$ (11,568)
August	2001	\$ (49)	\$ -	\$ (49)	\$ -	\$ -	\$ -	\$ (49)	\$ -	\$ (49)
September	2001	\$ (5,199)	\$ -	\$ (5,199)	\$ 1,217	\$ -	\$ 1,217	\$ (3,982)	\$ -	\$ (3,982)
October	2001	\$ 2,000	\$ -	\$ 2,000	\$ 11,437	\$ -	\$ 11,437	\$ 13,437	\$ -	\$ 13,437
November	2001	\$ (59,648)	\$ -	\$ (59,648)	\$ -	\$ -	\$ -	\$ (59,648)	\$ -	\$ (59,648)
December	2001	\$ (48,032)	\$ -	\$ (48,032)	\$ 224,468	\$ 21,147	\$ 203,320	\$ 176,436	\$ 21,147	\$ 155,288
January	2002	\$ (79,724)	\$ -	\$ (79,724)	\$ -	\$ -	\$ -	\$ (79,724)	\$ -	\$ (79,724)
February	2002	\$ (35,661)	\$ -	\$ (35,661)	\$ 250,352	\$ 112,957	\$ 137,395	\$ 214,692	\$ 112,957	\$ 101,735
March	2002	\$ (58,084)	\$ -	\$ (58,084)	\$ 10,661	\$ 5,331	\$ 5,331	\$ (47,423)	\$ 5,331	\$ (52,754)
April	2002	\$ (29,418)	\$ -	\$ (29,418)	\$ 12,918	\$ 6,459	\$ 6,459	\$ (16,500)	\$ 6,459	\$ (22,959)
May	2002	\$ (43,311)	\$ -	\$ (43,311)	\$ 2,500,000	\$ 1,250,000	\$ 1,250,000	\$ 2,456,689	\$ 1,250,000	\$ 1,206,689
June	2002	\$ (55,226)	\$ (13,532)	\$ (41,694)	\$ 5,444	\$ 2,722	\$ 2,722	\$ (49,782)	\$ (10,810)	\$ (38,972)
		\$ (423,920)	\$ (13,532)	\$ (410,388)	\$ 3,016,498	\$ 1,398,616	\$ 1,617,882	\$ 2,592,578	\$ 1,385,084	\$ 1,207,494

1/ The monthly gain or loss set forth in this column reflects total gains or losses calculated under the gas procurement mechanism, including gains or losses within the one percent deadband.

2/ Nashville GPI sharing reflects 50% of gains or losses calculated under the gas procurement mechanism after application of the one percent monthly deadband.

3/ Nashville sharing percentages range from 0% (up to 1% of annual demand savings), to 10% (1% - 2% savings), to 25% (2% - 3% savings), and to 50% (> 3% savings). Total capacity demand costs for the period are based on estimated annual costs for the plan year. These sharing amounts shall be adjusted based on the actual demand costs incurred, taking into account refunds or surcharges from pipeline and storage supplies.
(See Service Schedule No. 14, page 5)

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DISCOVERY REQUEST NO. 6:

Please explain in detail the complete Request for Proposal (RFP) process that Nashville Gas uses to select an asset manager. Include in your explanation a chronological description of all steps necessary to select an asset manager, including the amount of time required to complete each step. For each step of the RFP process, identity all company personnel involved, identity all company affiliates involved, and identity all documents used. Also, provide a description of all criteria used to select potential asset managers as well as a description of all criteria used to select the winning asset manager.

RESPONSE: Typically, the Asset Management RFP is updated by members of the gas supply department during the summer and then emailed to potential asset managers (the Asset Management agreements are usually in place from November to October, so the RFP is typically sent out around September). A notice of the RFP is also posted in Gas Daily at approximately the same time that the email is sent. The recipients of the email are given approximately two weeks to respond. The bids are evaluated by Gas Supply personnel and a decision is made on the best bid by the Director of Gas Supply and approved by the Senior VP of Commercial Operations within a 1 to 3 day period. This bid will often be disclosed to the incumbent Asset Manager (assuming their performance during the previous period warrants a right to match), permitting them the right to match the bid. Piedmont evaluates a number of criteria to determine a potential asset manager's ability to provide reliable service. Piedmont considers the experience the asset manager's personnel has on the various pipelines that serve Nashville Gas. Piedmont then evaluates its relationship and previous experiences with the potential asset manager, and the asset

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manager's level of experience with similar arrangements. Lastly, Piedmont assesses the asset manager's current financial stability. After Piedmont determines which potential asset managers are acceptable to the Company based upon the aforementioned criteria, Piedmont will then use the values bid to help determine the winning bidder.

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DISCOVERY REQUEST NO. 7:

Please produce copies of all documents used in or related to the RFP process for selection of the asset manager for the periods July 1, 2002, through June 30, 2003; July 1, 2003, through June 30, 2004; and July 1, 2004 through June 30, 2005.

RESPONSE: Copies of asset management contracts are included in the Response to Discovery Request No. 9. Copies of bidder responses to RFPs are included in the Response to Discovery Request No. 12. Copies of the RFPs are attached.

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DISCOVERY REQUEST NO. 8:

Please produce copies of all documents that the company contends support inclusion of asset management fees in the Performance Incentive Plan for the periods July 1, 2002, through June 30, 2003; July 1, 2003, through June 30, 2004; and July 1, 2004, through June 30, 2005. For each document produced, explain why the document supports inclusion of Asset Management Fees in the Performance Incentive Plan.

RESPONSE: Copies of all documents that support inclusion of asset management fees in the Performance Incentive Plan are included in responses to other Discovery Request questions. The Company receives a fee from the Asset Manager for the value the Asset Manager creates from unutilized released assets. Such value can not be derived without a capacity release transaction(s) and the resulting asset management payment associated with the release(s).

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DISCOVERY REQUEST NO. 9:

Produce copies of all contracts, agreements or arrangements entered into between the company and the asset manager(s) selected for the periods July 1, 2002, through June 30, 2003; July 1, 2003, through June 30, 2004; and July 1, 2004, through June 30, 2005.

RESPONSE: Please see the attached copies of the asset manager contracts in place during the July 2002 to June 2005 period. The contracts detail all the functions and requirements of an asset manager. The benefit to the consumers is the fee paid by the asset manager.

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DISCOVERY REQUEST NO. 10:

Please state all facts, basis, grounds, and reasons that the company contends support inclusion of asset management fees in the Performance Incentive Plan for the periods July 1, 2002, through June 30, 2003; July 1, 2003, through June 30, 2004; and July 1, 2004, through June 30, 2005. For each fact, basis, ground, and reason stated, please explain why the fact, basis, ground, or reason supports inclusion of asset management fees in the Performance Incentive Plan.

RESPONSE: Nashville Gas objects to this request on the grounds that it is overbroad, unduly burdensome and seeks, in part, the discovery of privileged information. Without waiving these objections, Nashville Gas responds as follows. The principal fact, basis and grounds supporting the inclusion of asset management fees in the Performance Incentive Plan is that they have been the subject of prolonged scrutiny and approval by the Tennessee Public Service Commission on an experimental basis and then by the Tennessee Regulatory Authority based on the recommendation of outside consultants. The purpose of an incentive program is to align the interests of the Company and its customers in order to encourage behavior that benefits both. In order to create the appropriate incentive, it is necessary that the benefits be material enough to reward the Company for its efforts to realize savings. The evidence strongly indicates that Nashville Gas' inclusion of asset management fees provides such an incentive and has resulted in substantial savings to customers. Other reasons justifying the inclusions of the asset management fees are set forth in the proceedings in which the asset management fees were

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approved. Nashville Gas is continuing to consider this request and will supplement its response,
as appropriate.

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DISCOVERY REQUEST NO. 11:

Please explain in detail the procedures the company uses to identify the transportation and storage capacity released to the Asset Manager.

RESPONSE: The Company has typically released all of its transportation and storage assets to the asset manager with the exception of its share of the Hattiesburg storage facility and the Company's own proprietary LNG facility. Hattiesburg storage is used primarily for balancing and emergency supply back-up while the LNG facility is attached physically to the Company's distribution system and has supply that can only flow into the Company's distribution system. The Company has independently released Hattiesburg storage twice. During those periods the Company maintained limited usage privileges for peaking and balancing use. For the rest of the assets released, the Company was permitted to nominate city-gate deliveries as if it still possessed the released assets.

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DISCOVERY REQUEST NO. 13:

If the company contends that it bears risks of monetary loss with respect to its asset management arrangements in Tennessee, please identify and explain each and every such risk of monetary loss borne by the company.

RESPONSE: Under the plan, the Company is at risk for meeting certain target prices for its gas supply. Because the plan is, by definition, an incentive plan, the sharing of capacity release and gas cost savings incents the Company to find and utilize new and creative mechanisms to save customers money and to assume risk on the commodity side. To the extent that the Company utilizes its transportation or supply assets in a manner that results in supply costs in excess of target prices, the Company is at risk for a portion of such excess cost, up to \$1,600,000. There is also an additional level of risk to the Company associated with the Asset Manager's level of performance.

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DISCOVERY REQUEST 15:

Please identify the asset manager(s) for Nashville Gas Company selected for the periods July 1, 2002, through June 30, 2003; July 1, 2003, through June 30, 2004; and July 1, 2004, through June 30, 2005. State whether any asset manager identified in response to this request is or was an affiliate of the company, and describe in detail any relationship between the asset manager and the company, including, but not confined to, any common ownership, directors, managers, agents, or employees.

RESPONSE: The following table shows the asset manager and the term of each agreement for the periods requested:

<u>Term of Agreement</u>	<u>Asset Mgr.</u>
Nov 2001 - Oct 2002	Dynegy
Nov 2002 - Mar 2003	None
Apr 2003 - Oct 2003	Sempra
Nov 2003 - Oct 2004	Entergy-Koch
Nov 2004 - Oct 2005	Merrill Lynch

None of the asset managers listed are or have been an affiliate of the Company. The Company was involved in the SouthStar joint venture with Dynegy and a third party. Piedmont and Dynegy both had directors on the SouthStar board. Piedmont has the ability, as it does with all marketers, to make sales and purchases with SouthStar. In all of its dealings with Dynegy as a supplier or asset manager, Piedmont treated Dynegy the same as it did all other suppliers/asset managers with which it had similar experience.

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DISCOVERY REQUEST NO. 16:

Please identify the name and location of all employees, agents, independent contractors, or other persons compensated by Nashville Gas Company or any related entity for the purpose of implementing, managing, or monitoring the capacity management part of the incentive plan for the plan years that ended June 30, 2003, June 30, 2004, and June 30, 2005, and as to each such person, explain the person's function, and explain if the person devoted all of his or her work time to performing that function or some portion of his or her work time.

RESPONSE: For the years ending 2003 and 2004, the following employees were compensated for devoting part of their time to implementing, managing and monitoring capacity management as part of the incentive plan.

Scott Searcy-Senior Gas Supply Representative

Jim Jessee- Manager-Gas Supply and Wholesale Marketing

Keith Maust-Director-Gas Supply and Wholesale Marketing

For the year ending 2005 the following employees were compensated for devoting part of their time to implementing, managing and monitoring capacity management as part of the incentive plan.

Sarah Stabley –Gas Supply Representative

Scott Searcy-Senior Gas Supply Representative

Jim Jessee- Manager-Gas Supply and Wholesale Marketing

Keith Maust-Director-Gas Supply and Wholesale Marketing

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DISCOVERY REQUEST NO. 18:

Please explain all safeguards that are in place to assure that the total cost of assets required to safely and reliably serve consumers is minimized.

RESPONSE: Piedmont evaluates interstate pipeline capacity offerings available at the time that it is determined that additional future firm delivery service is required. The Company attempts to match the days of service of new incremental transportation capacity to the duration of its incremental demand on the most economical basis possible, with offerings evaluated on an equivalent unit basis. Piedmont attempts to acquire peaking services to meet projected peak day demand, storage to meet projected seasonal demand, and year round pipeline capacity to meet projected baseload demand and provide gas supplies for replenishment of storage inventories.

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DISCOVERY REQUEST NO. 19:

Please explain the methods for maximizing profits by an asset manager, including, but not limited to capacity releases, off-system sales, purchases by the asset manager for the local distribution company, storage deals and propane transactions.

RESPONSE: Nashville Gas is not an asset manager and is without information sufficient to answer this discovery request.

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DISCOVERY REQUEST NO 20:

Please explain any instances over the past five years of any individuals (including names) leaving your company to go to an asset manager or an affiliate of the asset manager and any instances of employees (including names) of the asset manager going to the local distribution company or an affiliate of the local distribution company.

RESPONSE: None.

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DISCOVERY REQUEST NO. 21:

Please explain the relationship with your asset manager with respect to the handling of company assets, specifically answering whether the asset manager acts as an “agent” or whether assets are “assigned” to the asset manager. What are the advantages and disadvantages of each such arrangement?

RESPONSE: Typically the Company releases capacity and storage assets to the asset manager. This means the asset manager takes possession of the storage and capacity assets and does not involve either assignment or agency arrangements. The Company has assigned gas supply contracts as part of the asset management process. In assigning a supply contract to an asset manager, the asset manager accepts ownership of the contractual obligations of the contract and acts for itself. If the Company were to allow the asset manager to become its agent for its supply contracts, the asset manager would legally be acting as the Company, with the Company being legally responsible for the asset manager's actions.

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DISCOVERY REQUEST NO 24:

Please explain the “dispatch planning process” for Nashville Gas in coordination with Piedmont Gas and the asset manager. Does Nashville Gas have its least-cost dispatch plan separate from Piedmont’s or the asset manager’s?

RESPONSE: The Piedmont gas supply group arranges to satisfy the needs of the Nashville distribution system. Piedmont maintains a separate supply portfolio to satisfy the demands of its Nashville distribution system.

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DISCOVERY REQUEST NO. 25:

If Nashville Gas' dispatch gas plan is separate from Piedmont's or the asset managers', please explain how Nashville's assets are kept separate from those of the other two; and please explain how the asset manager adds value to the Nashville Gas dispatch plan.

RESPONSE: The Nashville Gas dispatch plan is separate and apart from the dispatch plan for the Carolinas. Although the Carolinas and Nashville may have capacity on the same interstate pipelines, each location has their own distinct contracts. Demand for both locations is forecasted separately and nominations to interstate pipelines are handled separately. The asset manager adds value to the Nashville dispatch plan by the payment it makes to the Company for the right to be the asset manager. Otherwise, the asset manager bills the Company for deliveries nominated by the Company at price levels the Company would have paid if it had retained its assets.

**NASHVILLE GAS COMPANY
REVIEW OF NASHVILLE GAS COMPANY'S IPA
RELATING TO ASSET MANAGEMENT FEES
DOCKET NO. 05-00165
CONSUMER ADVOCATE AND PROTECTION DIVISION
FIRST DISCOVERY REQUESTS
November 14, 2005**

DISCOVERY REQUEST NO 26:

Please explain the various options that asset managers can utilize the Nashville Gas' assets and provide a definition of each including, but not limited to: Capacity (Management) Release, Off-System Sales, Storage Utilization, Off-System Sales, Parks, Transportation, Interruptible options, Loans and Exchanges.

RESPONSE: Nashville Gas is not an asset manager and is without sufficient information to respond to this discovery request.

**NASHVILLE GAS COMPANY
REVIEW OF NASHVILLE GAS COMPANY'S IPA
RELATING TO ASSET MANAGEMENT FEES
DOCKET NO. 05-00165
CONSUMER ADVOCATE AND PROTECTION DIVISION
FIRST DISCOVERY REQUESTS
November 14, 2005**

DISCOVERY REQUEST NO. 27:

Please explain how the asset manager may add value by combining two or more of the options previously explained in Discovery Request No. 26, and please explain where these opportunities are summarized in your tariff.

RESPONSE: Nashville Gas is not an asset manager and is without sufficient information to respond to this discovery request.

STATE OF NORTH CAROLINA

VERIFICATION

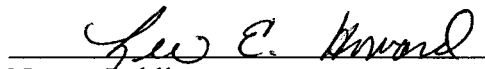
COUNTY OF MECKLENBURG

Bill R. Morris, being duly sworn, deposes and says that he is Director of Financial Planning and Rates of Piedmont Natural Gas Company, Inc., that as such, he has read the foregoing Responses and knows the contents thereof; that the same are true of his own knowledge except as to those matters stated on information and belief and as to those he believes them to be true.



Bill R. Morris

Sworn to and subscribed before me
this the 13 day of
December, 2005.


Notary Public

My Commission Expires:

MY COMMISSION EXPIRES 10-29-10

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the *Responses of Nashville Gas Company, A Division of Piedmont Natural Gas Company, Inc., to the Consumer Advocate and Protection Division's First Discovery Requests* is being served upon the parties in this action either by hand delivery or by UPS overnight delivery addressed as follows:

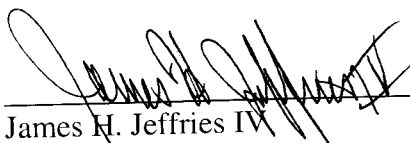
Bill R. Morris
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Piedmont Natural Gas Company, Inc.
P.O. Box 33068
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AmSouth Center
315 Deaderick Street, Suite 2700
Nashville, Tennessee 37238

This the 13th day of December, 2005.


James H. Jeffries IV